

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V Draft Permit No. V-03-050

JIM BEAM BRANDS COMPANY, OLD GRAND DAD PLANT

FRANKFORT, KY.

January 12, 2004

VAN DO, REVIEWER

Plant I.D. # 21-073-00003

Application Log # 56041

SOURCE DESCRIPTION:

Jim Beam facility processes distilled spirits, which are brought in by truck and pumped into storage tanks. The spirits are pumped from the storage tanks and/or into aging barrels. The barrels are then placed in aging warehouses. After the spirits are aged in barrels, they are pumped from the barrels to holding tanks. The spirits are then pumped from the tanks to the bottling line where the spirits are bottled, labeled, and prepared for shipment. The indirect heat exchangers on site are for heating purposes.

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| Unit 01: | Barrel Filling, Aging and Dumping. Construction Commenced 1911-1991 |
| Unit 02: | Cistern, Holding, Processing, and Bottling Tanks, Bottle Filling, Labeling and Coding, and VOC Equipment Leaks. Construction Commenced 1978-1996. |
| Unit 03: | Natural Gas Fired (#2 Oil Back-Up) Horizontally Opposed Indirect Heat Exchanger #1. Construction Commenced 1992. |
| Unit 04: | Natural Gas Fired (#2 Oil Back-Up) Horizontally Opposed Indirect Heat Exchanger #2. Construction Commenced 1992. |

REGULATION APPLICABILITY:

401 KAR 59:015, New Indirect Heat Exchangers

401 KAR 60:005, Standards of performance for small industrial-commercial-institutional steam generating units, incorporating by reference 40 CFR 60, Subpart Dc, for units less than or equal to 100 MMBTU/hour but greater than or equal to 10 MMBTU/hour commenced after June 9, 1989

REGULATION NOT APPLICABLE TO EMISSION UNIT 02 DUE TO PRODUCT PRODUCED:

401 KAR 60:005, Standards of performance for new stationary sources, incorporating by reference 40 CFR 60.482, Subpart VV, applicable to VOC leaks in affected facilities that commenced construction or modification after January 5, 1981.

COMMENTS:

1. The permittee has not proposed any alternative operating scenarios for any of the emission units.
2. The three-hour averaging time associated with the particulate matter mass emission standards for emission units 03 and 04 are applicable during compliance demonstration when performance testing is required by the Division.
3. The permittee may ensure compliance with the emissions limitations and standards, while burning #2 fuel oil, conditioned within the permit for Emissions Units 03 and 04 by performing the calculations based upon heat and sulfur content, fuel usage and processing rates, and AP-42 emission factor information. Compliance for sulfur dioxide emissions limitations may also be ensured by using fuel supplier certification.
4. No applicable regulations apply to Emissions Units 01 and 02.
5. Any indirect heat exchanger burning natural gas is considered to be in compliance with PM, SO₂ and opacity standard.

CREDIBLE EVIDENCE:

6. This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.